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**Sent:** 15/12/2018 11:26:14 PM  
**Subject:** Online Submission

15/12/2018

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- 218 Sydney RD  
Fairlight NSW 2094  
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**RE: DA2018/1708 - 197 Sydney Road FAIRLIGHT NSW 2094**

Dear Mr Perry,

Objection - DA2018/1708 - 195 - 197 Sydney Road, Fairlight - Demolition works and construction of a boarding house

I would like to object to the approval of the proposed development based upon the following points, noting that -

1. The currently proposed management measures would likely not result in the development meeting the Manly DCP 2013 boarding house objectives, as it has not been demonstrated that the development can sufficiently minimise noise impacts and maintain the amenity at adjoining properties.
2. Approval of the current design would be premature without additional parking controls being implemented by Northern Beaches Council.

#### Traffic and Parking

The traffic assessment notes that sufficient parking spaces have been provided to meet the requirements of both the SEPP ARH 2009 and Manly DCP 2013, which is also noted by the Northern Beaches Traffic Engineer review. However, the traffic assessment also notes that the car parking provision will ensure that all car parking demands are accommodated on-site, with no reliance on on-street parking.

The area directly surrounding the development does not currently have a parking permit scheme for residents, and currently does not require a Northern Beaches Parking permit for on-street parking. As such, there are no existing controls or methods of enforcement in place to prevent on-street parking for future residence of the development.

Approving the development without further controls, such as the implementation of a parking permit scheme for the area, would result in -

1. The boarding house being approved prematurely without appropriate parking management and enforcement measures in place.
2. The boarding house would then likely operate inconsistent with the traffic impact assessment as there would be no true method of enforcement for on-street parking.

Further evidence should be provided to demonstrate that for a 126 person boarding house, with the provision for only 35 car parking spaces and 3 disabled car parking spaces, why there would be no reliance on on-street parking.

#### Noise

Operational  
Communal area and BBQ facilities

Section 4.4.9 of the Manly DCP 2013 outlines the objectives for boarding houses, which are:

Objective 1) To support high quality affordable rental housing in the form of boarding houses with an acceptable level of amenity to meet the needs of residents and to minimise adverse impacts on adjoining properties and in the vicinity.

Objective 2) To provide controls for boarding houses that are compatible with, and enhance local character and the desired future character and provide a high level of resident amenity, safety and privacy for boarders and neighbours

The sun-lawn with BBQ facilities and communal area is located central in the development land area. This area is overlooked by the adjacent residential building to the east. As the communal area is proposed to be fitted with BBQ facilities, it is likely that it will be used for communal and social events.

For a typical multi-dwelling residential development, the use of communal areas for social gatherings is not frequent, and so levels of noise from these areas can typically be managed due to the infrequent nature of their use. However, in the case of the proposed boarding house having up to 126 people, the area being fitted with BBQ facilities, and that the nature of the boarding house is such that it will be operated in a manner similar to a commercial development with a building manager, this area will be used more frequently. As such noise impacts from the use of the communal area cannot be considered negligible and should be sufficiently assessed and appropriate mitigation and management measures incorporated into the development.

Section 6.5 - Communal Area, in the Wood & Grieve Engineers Acoustic Report (Ref: 39921, Rev 00, dated 31 August 2018) identifies a number of management measures that should be implemented as part of the operations of the facilities. These are recommended to be implemented in the Northern Beaches Council Environmental health referral, and a partially addressed in the Micronest Plan of Management. However, even with the implementation of these management measures the noise impacts at the adjacent neighbour may exceed the requirements and could result in offensive levels of noise.

Potential noise impacts have not been quantified to adjacent neighbours and so it cannot be determined if the recommended management measures would achieve the required noise levels and sufficiently manage noise impacts. It is not clear that by implementing the management measures of restricting the usage of this area to the day and evening periods, and limiting the number of people are management measures that in practice would result in acceptable noise impacts that do not result in offensive noise due to the close proximity and location of the adjacent dwellings (eg. even only a few people would result in excessive noise at the neighbours during the day and evening).

The above further substantiates the concerns raised in the Northern Beaches Council Environmental health referral, and that the current design proposal is not consistent with the requirements of the area and the objectives for boarding houses in the Manly DCP 2013.

Please consider the above points when reviewing the best way to proceed with this development.

Kind regards,

Angus Leslie  
218 Sydney Road, Fairlight